DRAFT RESPONSES TO LADWP COMMENTS ON GBUAPCD 2012 ANNUAL NETWORK PLAN

LADWP submitted comments to GBUAPCD during the 2012 annual network plan (2012 ANP) comment period on 5/16/2012. GBUACPD responded to these comment via an internal memorandum on 5/23/2012, which was included with the final 2012 ANP submitted to EPA on 6/29/2012. LAWDP has subsequently sent a letter to EPA on 9/28/2012 expanding upon the comments made in the 5/16/2012 letter, and providing responds to GBUAPCD's responses in the 5/23/2012 memoranda. Generally, LADWP does not believe that their comments were adequately considered by GBUAPCD.

Comment: While LADWPD acknowledges that GBUAPCD's SLAMS network is covered under an approved ARB QAPP, they contend that the plan does not cover the use of the data to identify supplemental dust control areas on Owens Lake because it does not properly assure quality for all the instrument systems that are used in the dust source identification process. In the September 28, 2012 letter, LADWP further explains that some of those missing instrument system elements include sand motion monitoring and video monitoring. LADWP also requests that GBUAPCD update its PM_{10} and $PM_{2.5}$ QAPPs to include all of the instrument systems that are required to implement the procedures described in the 2008 SIP, and have those QAPPs approved in a public proceeding.

Response: All requirements contained in 40 CFR 58 Appendix A, including the requirements for QAPPs, are only applicable to SLAMS air monitoring data and PSD data. These requirements also apply to all SPM stations using FRM, FEM, or ARM methods which meet the requirements of 40 CFR 58 Appendix E. LADWP's initial comments on the 2012 ANP and their subsequent September 28, 2012 letter both acknowledge that the SLAMS network that is the subject of the 2012 ANP is covered by ARB's QAP. As the additional instrument systems mentioned by LADWP in their comments do not measure ambient air quality and are not SLAMS, information pertaining to the operation of those instruments and the subsequent data use in the dust source identification process is not required to be included in the QAPPs that required by 40 CFR 58 Appendix A, §2.

Comment: The current GBUAPCD monitoring network design is problematic because it focuses on Owens Lake and does not adequately assess contributions from other source areas. LAWDP also requests that GBUAPCD identify the major off-lake source areas and monitor them for both sand motion and dust emissions.

Response: Comments concerning which sources are influencing specific monitors are beyond the scope of what EPA is required to review and approve as part of the annual network plan process. Generally, ambient air monitoring network design is performed by the State or local air districts. In 40 CFR 58 Appendix D, §1.1.2, EPA further explains that the network design requirements are intended to lend support for the flexibility necessary to meet data collection needs of area air quality managers. Currently, the Owens Lake network does not appear to be problematic as the number of monitors operated by GBAPCD in the Owens Lake area far exceeds the minimum requirements set by EPA regulations.

Comment: The Keeler $PM_{2.5}$ and PM_{10} monitors, and the North Beach PM_{10} monitor appear to violate the EPA siting criteria contained in 40 CFR 58 Appendix E, §3 (a) due to their close proximity to a number of unpaved roads.

Response: Acceptable spacing from roadways for particulate matter is defined in 40 CFR 58 Appendix E, §6.3. As the distance from roadways for these two sites appears to be greater than 15 meters, both sites are appropriately designated as neighborhood scale. Also, as explained in 40 CFR 58 Appendix E, §3 (a), it is important to understand the monitoring objective for a particular location in order to interpret the requirement for spacing from minor sources. The Keeler and North Beach monitoring sites are characterized as having population oriented (population exposure)and source impact (source oriented) site types, respectively, and Appendix E, §3 (a) explains that if the objective for a monitoring site is to investigate local PM_{10} sources, then the sire is likely to be properly located nearby. Furthermore, in these instances, capturing the influence of emissions from nearby unpaved roads may be important, and moving these monitors away from such sources may underestimate the population's exposure to harmful levels of PM_{10} and $PM_{2.5}$. Due to the monitoring objectives of these sites and their distance from roadways, the presence of nearby unpaved roads does not violate EPA's siting criteria in Appendix E, §3 or 6.3.

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Comment: The 2012 ANP does not adequately explain the April 2011 discontinuation and relocation of the Flat Rock PM10 monitor to the Mill Site.

Response: EPA agrees that there was insufficient information included in the 2012 ANP concerning the shutdown and relocation of the Flat Rock PM_{10} monitor. System modifications to the SLAMS network must meet specific criteria outlined in 40 CFR 58.14 and be subsequently approved by EPA. As there was not enough information to judge whether the shutdown and relocation of the Flat Rock monitor was appropriate, EPA is withholding approval of the modification and will work closely with the district to appropriately document the shutdown and relocation. As a practical matter, EPA acknowledges that the Flat Rock monitor is not the current design value site and has been measuring considerably lower PM_{10} concentrations than nearby sites for number years.

Comment: The Coso Junction monitoring site cannot be used to assess the contributions from Owens Lake.

Response: An assessment of whether the data from a specific monitor is influenced by a particular source is beyond the scope of what EPA is required to review and approve as part of the annual network plan process. In the 2012 ANP, the Coso Junction is appropriately characterized as a population oriented (population exposure) and pollutant transport (regional transport) regional scale monitoring site.

Comment: Information concerning the proposed new locations of the T-4 and T-23 non-regulatory SPMs is not included in the 2012 ANP.

Response: As described in the 2012 ANP and GBUACPD's responses to LADWP's comments, the T-4 and T-23 monitors are non-regulatory special purpose monitors that are being used to measure PM_{10} emissions near the remaining source areas on the lakebed and to further refine the District's Dust Identification Program model. As these monitors are only being used in short-term special studies, EPA generally does not require information for such monitors to be included as part of the ANP.